

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: ABBOTT LABORATORIES, ET AL.,  
PRETERM INFANT NUTRITION  
PRODUCTS LIABILITY LITIGATION**

**MDL No. 3026**

**Master Docket No. 1:22-cv-00071**

**Case No. 1:22-cv-05356**

**Hon. Rebecca R. Pallmeyer**

**JURY DEMAND**

**This Document Relates to:**

***Keosha Diggs, Individually and as Parent and  
General Guardian of K.B., a minor v. Abbott  
Laboratories, et al.***

**ABBOTT'S MOTION FOR SUMMARY JUDGMENT**

In accordance with the Court's May 15, 2025 Minute Entry (Dkt. 43), Defendants Abbott Laboratories and Abbott Laboratories, Inc. (collectively, "Abbott") hereby move pursuant to Federal Rule of Civil Procedure 56(a) and Local Rule 56.1 for summary judgment on all Counts in Plaintiff Keosha Diggs's Complaint. In support of its Motion, Abbott separately submits and incorporates by reference herein:

1. Abbott's Memorandum of Law in Support of Its Motion for Summary Judgment;
2. Abbott's Local Rule 56.1(a)(2) Statement of Material Facts in Support of Its Motion for Summary Judgment;
3. Exhibits to Abbott's Local Rule 56.1(a)(2) Statement of Material Facts in Support of Its Motion for Summary Judgment.

As demonstrated in the foregoing, there is no genuine dispute as to any material fact and Abbott is entitled to judgment as a matter of law on all counts.

WHEREFORE, Abbott respectfully requests that the Court enter an Order granting summary judgment in Abbott's favor on all counts and dismissing this action, and granting such other and further relief as the Court may deem just and appropriate.

Dated: June 2, 2025

Respectfully submitted,

/s/ Linda T. Coberly

James F. Hurst, P.C.  
**KIRKLAND & ELLIS LLP**  
333 West Wolf Point Plaza  
Chicago, IL 60654  
312-862-2000  
james.hurst@kirkland.com  
LEAD COUNSEL

Stephen V. D'Amore  
Linda T. Coberly  
**WINSTON & STRAWN LLP**  
35 W. Wacker Drive  
Chicago, IL 60601  
(312) 558-5600  
sdamore@winston.com  
lcoberly@winston.com

*Counsel for Defendants Abbott Laboratories and  
Abbott Laboratories, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Summary Judgment was served upon counsel of record on June 2, 2025 via the Court's electronic filing system.

/s/ Linda T. Coberly

*Counsel for Defendants Abbott Laboratories  
and Abbott Laboratories, Inc.*